

THE BERKMAN LAW OFFICE, LLC

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4/7/2016

Clerk's Office
United States District Judge
United States District Court for the District of Massachusetts
One Courthouse Way – Suite 2300
Boston, Massachusetts 02210
Attn: Geraldine Karasek

Re: *Lelchook, et al. v. Islamic Republic of Iran, et al.*
Docket no. 15-13715 (PBS)

Dear Ms. Karasek:

We represent the plaintiffs in the above-captioned matter. By order dated April 6, 2016, this Court entered a notice of default against defendant Bank Saderat Iran ("BSI"). DE 44. The Court also entered a Standing Order on motions for default judgments. DE 45.

In accordance with the Court's notice of default (DE 44), I now request that the Clerk effect service of these documents pursuant to F.R.C.P. 4(f)(2)(C)(ii) and 4(h)(2) pursuant to the below instructions. Please find enclosed two sets of documents collated separately and ready for service – one on BSI at its Iran address and one on BSI at its Paris address. Each set contains:

- 1) A copy of the notice of default (DE 44).
- 2) A copy of the Standing Order on motions for default judgment (DE 45).

We would like to effect service on BSI through DHL. Please use our DHL account number, which is 846-466-763 and appears on the DHL envelopes that we enclosed with this mailing.

Our firm has been approved by DHL for shipments to Iran, but the waybill must reflect the Court's address as sender. Additionally, per DHL's requirements for shipments to Iran, enclosed is a signed indemnity letter to go along with the shipment to BSI in Iran.

Pursuant to F.R.C.P. 4(f)(2)(C)(ii), which requires that the envelope be addressed and dispatched by the Clerk of the Court, I respectfully request that you place the set of documents meant for defendant Bank Saderat Iran in Tehran, Iran into a DHL envelope and address it as follows:

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Bank Saderat Iran

43 Somayeh Ave.

Tehran, Iran

Tel: 1-88306091

To ensure that the package does not get held up at customs, DHL has requested that when you call to schedule the pickup, you inform DHL that the package is going to an embargoed country and that both the sender's account and the Court's address are approved for shipments to Iran.

Pursuant to F.R.C.P. 4(f)(2)(C)(ii), which requires that the envelope be addressed and dispatched by the Clerk of the Court, I respectfully request that you place the set of documents meant for defendant Bank Saderat Iran in Paris into a second DHL envelope and address it as follows:

Bank Saderat Iran

16 Rue De La Paix 75002

Paris, France

Tel: 14-4860250

Please make the appropriate docket entries reflecting both the receipt of this request and the sending of the packages. Please do not hesitate to contact me as necessary.

Respectfully yours,


Robert J. Tolchin